

Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

To capture agencies’ affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their affirmative action plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities.

Section I: Efforts to Reach Regulatory Goals

EEOC regulations (29 CFR §1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with disabilities and persons with targeted disabilities in the federal government

1. Using the goal of 12% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If “yes”, describe the trigger(s) in the text box.

- | | |
|--------------------------------|------------|
| a. Cluster GS-1 to GS-10 (PWD) | Answer No |
| b. Cluster GS-11 to SES (PWD) | Answer Yes |

The percentage of PWD in the GS-11 to SES cluster was 9.51% in FY 2022, which fell below the goal of 12%.

*For GS employees, please use two clusters: GS-1 to GS-10 and GS-11 to SES, as set forth in 29 C.F.R. § 1614.203(d)(7). For all other pay plans, please use the approximate grade clusters that are above or below GS-11 Step 1 in the Washington, DC metropolitan region.

2. Using the goal of 2% as the benchmark, does your agency have a trigger involving PWTD by grade level cluster in the permanent workforce? If “yes”, describe the trigger(s) in the text box.

- | | |
|---------------------------------|------------|
| a. Cluster GS-1 to GS-10 (PWTD) | Answer No |
| b. Cluster GS-11 to SES (PWTD) | Answer Yes |

The percentage of PWTD in the GS-11 to SES cluster was 1.54% in FY 2022, which fell below the goal of 2%.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-1 to GS-10	168324	22034	13.09	4410	2.62
Grades GS-11 to SES	212828	19631	9.22	3172	1.49

3. Describe how the agency has communicated the numerical goals to the hiring managers and/or recruiters.

The numerical goals, information about the Disability Program and resources are available on the ORMDI website.

Section II: Model Disability Program

Pursuant to 29 C.F.R. § 1614.203(d)(1), agencies must ensure sufficient staff, training and resources to recruit and hire persons with disabilities and persons with targeted disabilities, administer the reasonable accommodation program and special emphasis program, and oversee any other disability hiring and advancement program the agency has in place.

A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY PROGRAM

1. Has the agency designated sufficient qualified personnel to implement its disability program during the reporting period? If “no”, describe the agency’s plan to improve the staffing for the upcoming year.

Answer No

VA plans to hire additional personnel to assist with the implementation of its disability program.

2. Identify all staff responsible for implementing the agency's disability employment program by the office, staff employment status, and responsible official.

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Special Emphasis Program for PWD and PWTD	19	0	343	Roberto Rojo National Disability Employment Program Manager roberto.rojo@va.gov
Answering questions from the public about hiring authorities that take disability into account	19	0	378	Roberto Rojo National Disability Employment Program Manager roberto.rojo@va.gov
Processing reasonable accommodation requests from applicants and employees	162	0	0	Dr. Andree M. Sutton Chief of Reasonable Accommodation Andree.Sutton@va.gov
Processing applications from PWD and PWTD	19	0	378	Roberto Rojo National Disability Employment Program Manager roberto.rojo@va.gov
Section 508 Compliance	24	0	0	Pat Sheehan Director, VA Section 508 Office Pat.Sheehan@va.gov
Architectural Barriers Act Compliance	19	0	84	Roberto Rojo National Disability Employment Program Manager roberto.rojo@va.gov

3. Has the agency provided disability program staff with sufficient training to carry out their responsibilities during the reporting period? If “yes”, describe the training that disability program staff have received. If “no”, describe the training planned for the upcoming year.

Answer Yes

In FY 2022, the National Disability Program Manager leveraged training as well as guidance materials from the DOL Office of Disability Employment Policy.

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

Has the agency provided sufficient funding and other resources to successfully implement the disability program during the reporting period? If “no”, describe the agency’s plan to ensure all aspects of the disability program have sufficient funding and other resources.

Answer No

VA plans to hire additional personnel to assist with the implementation of its disability program.

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	B.4.a.8. to effectively administer its special emphasis programs (such as, Federal Women’s Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]		
Objective	Increase staffing for Departmental SEPs.		
Target Date	Dec 31, 2020		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2022	April 28, 2022	Fill Federal Women's Program Manager position.
	Dec 29, 2023		Hire additional staff to help with the disabilities program.
	Dec 29, 2023		Fill the Hispanic Employment Program Manager position.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2022	The Federal Women's Program Manager was designated on April 28, 2022.	
	2019	An individual who completed a rotational assignment in the Office of Diversity and Inclusion through the U.S. OPM’s Presidential Management Fellows Program was later converted to a career appointment. Subsequently, the individual was assigned to the position of Program Specialist and serves as the Departmental American Indian and Alaska Native Program Manager and the Federal Women’s Program Manager.	

Brief Description of Program Deficiency	C.2.b.2. Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]		
Objective	Establish firewall between the RA Program Manager and the EEO Director.		
Target Date	Apr 3, 2020		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Feb 28, 2020		Identify the firewall needed between the RA Program Manager and the EEO Director.
	Mar 31, 2020		Implement the firewalls.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	

Brief Description of Program Deficiency	C.2.b.5. Does the agency process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If “no”, please provide the percentage of timely-processed requests, excluding ongoing interpretative services, in the comments column.		
Objective	Analyze the processing of all accommodation requests		
Target Date	Sep 29, 2023		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 29, 2023		Report on processing time.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2018	VA has gathered system requirements and established rules regarding mandatory usage of system.	
	2019	The RA Staff Office hired a management analyst to aid in the development of the system and monitor and track RA data once the system is developed.	
	2021	VA has completed development of the system and has trained all RACs on usage of the system.	
	2020	VA has contracted with Microsoft to develop an Administration wide system. Processing maps have been created and provided to the contractor and development of the system has already begun.	
	2022	VA completed development of the system and trained all RA Coordinators on usage of the system.	
Objective	Deploy a standardized system to track RA requests across VA.		
Target Date	Jul 31, 2019		
Completion Date	Jul 5, 2022		
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	May 31, 2019	December 10, 2021	Develop an enterprise-wide system to track RA requests.
	Jul 31, 2019	July 5, 2022	Deploy the system.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2022	VA completed development of the system and trained all RA Coordinators on usage of the system.	

Section IV: Plan to Recruit and Hire Individuals with Disabilities

Pursuant to 29 C.F.R. §1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of individuals with disabilities. The questions below are designed to identify outcomes of the agency’s recruitment program plan for PWD and PWTD

A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

1. Describe the programs and resources the agency uses to identify job applicants with disabilities, including individuals with targeted disabilities.

VA leverages various programs and resources to identify job applicants with disabilities. This includes but is not limited to the Vocational Rehabilitation and Employment (VR&E) and the Veterans and Military Spouse Talent Program (VMSTEP) who educate, promote, and conduct outreach to assist Veterans with understanding and navigating the Federal hiring process. Specifically, VR&E also provides job-related training to assist disabled Veterans with building skills necessary to obtain employment. VMSTEP provides direct support nationally to Veterans seeking employment in VA in addition to services such as assistance with navigating the Federal hiring process, resume writing and interviewing techniques. In addition, the National Selective Placement Program (SPP) manager, Administration level SPP managers and SPP Coordinators (SPPC) provide services to assist PWD and PWTD with employment opportunities using the Schedule A hiring authority.

2. Pursuant to 29 C.F.R. §1614.203(a)(3), describe the agency’s use of hiring authorities that take disability into account (e.g., Schedule A) to recruit PWD and PWTD for positions in the permanent workforce

VA hiring managers in coordination with VA HR offices use several hiring authorities which include schedule A, 30% or more disabled Veterans, and Veterans Recruitment Appointment authorities to attract and employ PWD based on the following criteria. Specifically, VA hiring managers use the Schedule A hiring authority to select eligible persons with severe physical, psychological, or intellectual disability for appointment to positions at any Grade level for which they qualify non-competitively, which means they do not have to go through the normal recruitment process. In addition, VA hiring managers use the 30% or more disabled Veterans authority to select eligible Veterans with a service-connected disability rating of 30% or more for appointment to positions at any Grade level for which they qualify. VA hiring managers may also use the Veterans Recruitment Appointment authority to select eligible disabled Veterans without competition to positions at any Grade level up to the GS-11 or equivalent for which they qualify. After VA HR offices verify eligibility, VA hiring manager may use any of the above-mentioned authorities to hire eligible and qualified PWD/PWTD candidates non-competitively which means by law, VA HR offices may use streamlined hiring procedures to appoint them at a faster rate than usual. To further attract PWD/PWTD candidates, all VA Job Opportunity Announcement templates in the USA Staffing System includes a statement encouraging individuals with disabilities to apply.

3. When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A), explain how the agency (1) determines if the individual is eligible for appointment under such authority; and, (2) forwards the individual's application to the relevant hiring officials with an explanation of how and when the individual may be appointed.

The SPPC receives the individual’s resume and Schedule A letter and reviews it to ensure eligibility. Once confirmed, the SPPC forwards the resume to the hiring manager of an open, vacant position for consideration and advises the hiring manager of the benefits of using this non-competitive hiring authority. Regardless of the referral method, whether via SPPC for Schedule A, VEP or self-referral to hiring managers for disabled PWD using other non-competitive hiring authorities, VA HR offices must verify eligibility and qualifications prior to appointment as described below. 1. VA HR Specialists must review the resume of the PWD to determine if the individual meets the specialized experience and qualification requirements for the position. 2. VA HR Specialists must review supporting documentation of the PWD to determine if the PWD/PWTD meets the eligibility requirements. 3. If the PWD meets both above requirements, the VA HR Specialist refers the PWD on a Certificate of Eligibles for consideration by the hiring manager. 4. If interested, the hiring manager may conduct an interview and select the candidate. 5. The hiring manager must return the Certificate of Eligibles with the selection of the PWD. 6. HR Specialist must contact the PWD and notify candidate of the selection and extend a tentative job offer. 7. When the PWD accepts the tentative job offer, the HR office may then make the appointment.

4. Has the agency provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A)? If “yes”, describe the type(s) of training and frequency. If “no”, describe the agency’s plan to provide this training.

Answer No

The SPPC training, currently in further development, will be offered to VA hiring managers to ensure VA HR content/context is unilaterally processed. In the interim, OCHCO developed a comprehensive job aide and provided corresponding training sessions to facilitate a clear understanding of Schedule A and other disability authorities to include emphasis on timely conversion. In addition, the OCHCO policy offices also frequently publish and disseminate a wide range of plain language guidance (e.g. Job Aids, Bulletins, Fact Sheets, etc.) on various hiring flexibilities and maintains a wealth of information on the OCHCO HR Library website.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

Describe the agency’s efforts to establish and maintain contacts with organizations that assist PWD, including PWTD, in securing and maintaining employment.

VA places the onus on each facility to ensure they are partnering with and marketing employment opportunities to external organizations such as state and local Disability Committees, Commissions, DOL and organizations as well as the disability offices at local colleges and universities. VA’s Section 504 Policy was published to ensure the accessibility of programs and activities

conducted by VA are in compliance with Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. § 794).

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

1. Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among the new hires in the permanent workforce? If “yes”, please describe the triggers below.

a. New Hires for Permanent Workforce (PWD) Answer Yes

b. New Hires for Permanent Workforce (PWTD) Answer No

Among the new hires in the permanent workforce in FY 2022, triggers exist for PWD (8.89%).

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	115000	13.13	0.19	6.51	0.10
% of Qualified Applicants	83469	12.47	0.19	6.09	0.10
% of New Hires	24063	5.83	1.24	1.03	0.28

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission- critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires for MCO (PWD) Answer Yes

b. New Hires for MCO (PWTD) Answer Yes

As compared to the benchmark, triggers exist for PWD in Psychology, Social Work, Medical Officer, Nurse, General Legal and Kindred Administration, Contracting, Information Technology Management, and Cemetery Caretaking. Triggers exist for all MCO's for PWTD.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability	Targetable Disability
		New Hires (%)	New Hires (%)
Numerical Goal	--	12%	2%
0180 PSYCHOLOGIST	418	5.02	0.96
0185 SOCIAL WORK	2322	8.44	2.45
0201 HUMAN RESOURCES MANAGEMENT	611	15.88	2.29
0602 PHYSICIAN	2822	2.41	0.28
0610 NURSING	9749	4.91	0.52
0901 GENERAL LEGAL AND KINDRED ADMINISTRATION	400	17.50	3.00
0996 VETERANS CLAIMS EXAMINING	1904	17.38	3.73
1102 CONTRACTING	445	11.91	1.80

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability	Targetable Disability
		New Hires (%)	New Hires (%)
Numerical Goal	--	12%	2%
2210 INFORMATION TECHNOLOGY MANAGEMENT	550	11.45	2.18
4754 CEMETERY CARETAKING	197	13.20	6.09

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified internal applicants for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Qualified Applicants for MCO (PWD) Answer No
- b. Qualified Applicants for MCO (PWTD) Answer No

4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among employees promoted to any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Promotions for MCO (PWD) Answer Yes
- b. Promotions for MCO (PWTD) Answer Yes

As compared to the benchmark, triggers exist for PWD and PWTD in all the MCOs..

Section V: Plan to Ensure Advancement Opportunities for Employees with Disabilities

Pursuant to 29 C.F.R. §1614.203(d)(1)(iii), agencies are required to provide sufficient advancement opportunities for employees with disabilities. Such activities might include specialized training and mentoring programs, career development opportunities, awards programs, promotions, and similar programs that address advancement. In this section, agencies should identify, and provide data on programs designed to ensure advancement opportunities for employees with disabilities.

A. ADVANCEMENT PROGRAM PLAN

Describe the agency’s plan to ensure PWD, including PWTD, have sufficient opportunities for advancement.

An internal policy document is being created to ensure managers and supervisors understand how they can better utilize available tools to encourage participation in opportunities for career development and promotion. VA designated learning officers at most VA facilities to assist VA staff in identifying career development and training resources and opportunities. Program announcements for advancement opportunities or development will contain language, to include PWD and PWTD.

B. CAREER DEVELOPMENT OPPORTUNITES

1. Please describe the career development opportunities that the agency provides to its employees.

VA has numerous formal career and leadership development programs available for all employees. In addition, the VA Acquisition Academy offers training opportunities that lead to certifications in Federal Acquisition processes that employees can use to seek further career advancement.

2.

In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/ approval to participate.

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	223			4.28		
Fellowship Programs	995	28		3.57		
Coaching Programs						
Training Programs						
Other Career Development Programs	63	7				
Mentoring Programs						
Detail Programs						

3. Do triggers exist for PWD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Applicants (PWD) Answer N/A
- b. Selections (PWD) Answer N/A

Although improvements have been made regarding collecting applicant data for some enterprise-wide career development opportunities, VA is still working on collecting this data enterprise wide. Therefore, with the data we do have, it is hard to determine if triggers exist for applicants and/or selectees.

4. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Applicants (PWTD) Answer N/A
- b. Selections (PWTD) Answer N/A

Although improvements have been made regarding collecting applicant data for some enterprise-wide career development opportunities, VA is still working on collecting this data enterprise-wide. Therefore, with the data we do have, it is hard to determine if triggers exist for applicants and/or selectees.

C. AWARDS

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for any level of the time-off awards, bonuses, or other incentives? If “yes”, please describe the trigger(s) in the text box.

- a. Awards, Bonuses, & Incentives (PWD) Answer Yes
- b. Awards, Bonuses, & Incentives (PWTD) Answer Yes

VA identified triggers involving the percentage of PWD who received cash awards (\$4,000 - \$4,999 and \$5,000 or more). Also, VA identified triggers involving the percentage of PWTD who received time-off awards (11-20 hours, 31 – 40 hours) and cash awards (\$1,000 - \$1,999, \$2,000 - \$2,999, \$3,000 - \$3,999, \$4,000 - \$4,999 and \$5,000 or more).

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 1 - 10 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 1 - 10 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 11 - 20 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 11 - 20 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 11 - 20 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Average Hours	0	0.00	0.00	0.00	0.00

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$501 - \$999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$501 - \$999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$501 - \$999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Average Amount	0	0.00	0.00	0.00	0.00

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$4000 - \$4999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$4000 - \$4999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$4000 - \$4999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Average Amount	0	0.00	0.00	0.00	0.00

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance-based pay increases? If “yes”, please describe the trigger(s) in the text box.

- a. Pay Increases (PWD) Answer Yes
- b. Pay Increases (PWTD) Answer Yes

VA identified a trigger involving the percentage of PWD who received performance-based pay increases. Additionally, VA identified a trigger involving the percentage of PWTD who received quality step and performance-based pay increases.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Total Performance Based Pay Increases Awarded	0	0.00	0.00	0.00	0.00

3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If “yes”, describe the employee recognition program and relevant data in the text box.

- a. Other Types of Recognition (PWD) Answer N/A
- b. Other Types of Recognition (PWTD) Answer N/A

D. PROMOTIONS

1. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. SES
 - i. Qualified Internal Applicants (PWD) Answer Yes
 - ii. Internal Selections (PWD) Answer No
- b. Grade GS-15
 - i. Qualified Internal Applicants (PWD) Answer No
 - ii. Internal Selections (PWD) Answer Yes

c. Grade GS-14

- i. Qualified Internal Applicants (PWD) Answer No
- ii. Internal Selections (PWD) Answer Yes

d. Grade GS-13

- i. Qualified Internal Applicants (PWD) Answer No
- ii. Internal Selections (PWD) Answer Yes

The percentage of PWD among the qualified internal applicants for SES (0.00%) fell below the benchmark of the relevant applicant pool. The percentage of PWD among the internal selections for GS-15 (8.30%), GS-14 (9.75%), GS-13 (10.78%) fell below the benchmark of the qualified applicants.

2. Does your agency have a trigger involving PWT D among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. SES

- i. Qualified Internal Applicants (PWTD) Answer Yes
- ii. Internal Selections (PWTD) Answer No

b. Grade GS-15

- i. Qualified Internal Applicants (PWTD) Answer No
- ii. Internal Selections (PWTD) Answer Yes

c. Grade GS-14

- i. Qualified Internal Applicants (PWTD) Answer No
- ii. Internal Selections (PWTD) Answer Yes

d. Grade GS-13

- i. Qualified Internal Applicants (PWTD) Answer No
- ii. Internal Selections (PWTD) Answer Yes

The percentage of PWTD among the qualified internal applicants for SES (0.00%) fell below the benchmark of the relevant applicant pool. The percentage of PWTD among the internal selections for GS-15 (1.59%), GS-14 (1.47%), GS-13 (1.72%) fell below the benchmark of the qualified applicants.

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires to SES (PWD) Answer Yes
- b. New Hires to GS-15 (PWD) Answer Yes

- c. New Hires to GS-14 (PWD) Answer Yes
- d. New Hires to GS-13 (PWD) Answer Yes

The percentage of PWD among the new hires at the SES level (0.00%) and grades GS-15 (2.61%) GS-14 (8.81%), and GS-13 (6.78%) fell below the benchmark of the qualified applicant pool.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires to SES (PWTD) Answer Yes
- b. New Hires to GS-15 (PWTD) Answer Yes
- c. New Hires to GS-14 (PWTD) Answer Yes
- d. New Hires to GS-13 (PWTD) Answer Yes

The percentage of PWTD among the new hires at the SES level (0.00%) and grades GS-15 (0.36%), GS-14 (1.69%) and GS-13 (0.96%) fell below the benchmark of the qualified applicant pool.

5. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Executives
 - i. Qualified Internal Applicants (PWD) Answer No
 - ii. Internal Selections (PWD) Answer Yes
- b. Managers
 - i. Qualified Internal Applicants (PWD) Answer No
 - ii. Internal Selections (PWD) Answer Yes
- c. Supervisors
 - i. Qualified Internal Applicants (PWD) Answer No
 - ii. Internal Selections (PWD) Answer Yes

In comparison to the qualified applicant pool, triggers exist for PWD among the selectees for promotions to executive (8.19%), manager (11.98%) and supervisors (16.24%) positions.

6. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Executives
 - i. Qualified Internal Applicants (PWTD) Answer No

- ii. Internal Selections (PWTD) Answer Yes
- b. Managers
 - i. Qualified Internal Applicants (PWTD) Answer No
 - ii. Internal Selections (PWTD) Answer Yes
- c. Supervisors
 - i. Qualified Internal Applicants (PWTD) Answer No
 - ii. Internal Selections (PWTD) Answer Yes

In comparison to the qualified applicant pool, triggers exist for PWTD among the selectees for promotions to executive (0.99%), manager (1.93%) and supervisor (3.10%) positions.

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
- a. New Hires for Executives (PWD) Answer Yes
 - b. New Hires for Managers (PWD) Answer Yes
 - c. New Hires for Supervisors (PWD) Answer Yes

In comparison to the qualified applicant pool, triggers exist for PWD among the new hires to executive (2.78%), manager (7.58%) and supervisor (10.06%) positions.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
- a. New Hires for Executives (PWTD) Answer Yes
 - b. New Hires for Managers (PWTD) Answer Yes
 - c. New Hires for Supervisors (PWTD) Answer Yes

In comparison to the qualified applicant pool, triggers exist for PWTD among the new hires to executive (0.69%), manager (0.91%) and supervisor (1.53%) positions.

Section VI: Plan to Improve Retention of Persons with Disabilities

To be model employer for persons with disabilities, agencies must have policies and programs in place to retain employees with disabilities. In this section, agencies should: (1) analyze workforce separation data to identify barriers retaining employees with disabilities; (2) describe efforts to ensure accessibility of technology and facilities; and (3) provide information on the reasonable accommodation program and workplace assistance services.

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

1. In this reporting period, did the agency convert all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service (5 C.F.R. § 213.3102(u)(6)(i))? If “no”, please explain why the agency did not convert all eligible Schedule A employees.

Answer No

VA was unable to verify if all eligible Schedule A employees with a disability were converted into the competitive service after 2 years of satisfactory service.

2. Using the inclusion rate as the benchmark, did the percentage of PWD among voluntary and involuntary separations exceed that of persons without disabilities? If “yes”, describe the trigger below.

a. Voluntary Separations (PWD) Answer Yes

b. Involuntary Separations (PWD) Answer Yes

Triggers exist for PWD (11.44%) who voluntarily separated from VA, as compared to the rate of persons without disabilities (9.38%) and for PWD (1.06%) who involuntarily separated from VA, as compared to the rate of persons without disabilities (0.52%).

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	2580	1.02	0.54
Permanent Workforce: Resignation	23054	5.42	5.33
Permanent Workforce: Retirement	13079	4.15	2.88
Permanent Workforce: Other Separations	3962	1.46	0.85
Permanent Workforce: Total Separations	42675	12.05	9.59

3. Using the inclusion rate as the benchmark, did the percentage of PWTD among voluntary and involuntary separations exceed that of persons without targeted disabilities? If “yes”, describe the trigger below.

a. Voluntary Separations (PWTD) Answer Yes

b. Involuntary Separations (PWTD) Answer Yes

Triggers exist for PWTD (11.83%) who voluntarily separated from VA, as compared to the rate of persons without targeted disabilities (9.67%) and for PWTD (1.53%) who involuntarily separated from VA, as compared to the rate of persons without targeted disabilities (0.60%).

Separations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	2580	1.46	0.58
Permanent Workforce: Resignation	23054	6.36	5.31
Permanent Workforce: Retirement	13079	3.37	3.02
Permanent Workforce: Other Separations	3962	1.57	0.90
Permanent Workforce: Total Separations	42675	12.76	9.81

4. If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using exit interview results and other data sources.

The top three most important reasons PWD voluntarily left VA was due to personal health issues, lack of trust/confidence in senior leaders and unethical behavior on the part of leadership or the organization. The top three most important reasons PWTD voluntarily left VA was due to personal health issues, opportunity for advancement, lack of trust/confidence in senior leaders and unethical behavior on the part of leadership or the organization.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 29 CFR §1614.203(d)(4), federal agencies are required to inform applicants and employees of their rights under Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. § 794(b), concerning the accessibility of agency technology, and the Architectural Barriers Act of 1968 (42 U.S.C. § 4151-4157), concerning the accessibility of agency facilities. In addition, agencies are required to inform individuals where to file complaints if other agencies are responsible for a violation.

1. Please provide the internet address on the agency’s public website for its notice explaining employees’ and applicants’ rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint.

<https://www.section508.va.gov/index.asp>.

2. Please provide the internet address on the agency’s public website for its notice explaining employees’ and applicants’ rights under the Architectural Barriers Act, including a description of how to file a complaint.

<https://www.va.gov/ORMDI/DiversityInclusion/IWD.asp> Please note the following above hyperlink established within our new ORMDI internet website, includes the hyperlink: <https://www.access-board.gov/enforcement/>, which notifies how employees/ applicants can file an Architectural Barriers Act Complaint.

3. Describe any programs, policies, or practices that the agency has undertaken, or plans on undertaking over the next fiscal year, designed to improve accessibility of agency facilities and/or technology.

VA is advocating and evaluating the enterprise creation of an Accessibility Office which will handle All VA Department-wide accessibility concerns.

C. REASONABLE ACCOMMODATION PROGRAM

Pursuant to 29 C.F.R. § 1614.203(d)(3), agencies must adopt, post on their public website, and make available to all job applicants and employees, reasonable accommodation procedures.

1. Please provide the average time frame for processing initial requests for reasonable accommodations during the reporting period. (Please do not include previously approved requests with repetitive accommodations, such as interpreting services.)

RAMS was just launched in July 2022. Currently, there is not enough data in the system to make the Agency wide determination.

2. Describe the effectiveness of the policies, procedures, or practices to implement the agency’s reasonable accommodation program. Some examples of an effective program include timely processing requests, timely providing approved accommodations, conducting training for managers and supervisors, and monitoring accommodation requests for trends.

Determining effectiveness will require additional staffing at the Department Level. Additional metrics regarding timelines will be trackable through the newly launched RAM system once there is significant data input to make an assessment.

D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE

Pursuant to 29 CFR §1614.203(d)(5), federal agencies, as an aspect of affirmative action, are required to provide personal assistance services (PAS) to employees who need them because of a targeted disability, unless doing so would impose an undue hardship on the agency.

Describe the effectiveness of the policies, procedures, or practices to implement the PAS requirement. Some examples of an effective program include timely processing requests for PAS, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

VA provided PAS services to a wide variety of employees ranging from providers to support personnel. We are unable to provide a firm number at this time but will have the capability eventually with the launch of the RAMS.

Section VII: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the governmentwide average?

Answer Yes

2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?

Answer Yes

3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

In FY 2022 there were 9 cases where there was a finding of discrimination involving a PWD filing a harassment claim based on disability. In each case, the remedial and corrective actions ordered included: • Training for all individuals involved. • Consideration of disciplinary action for involved management officials. • Make-whole relief for the complainant (to include compensatory damages). • Restoration of leave. • Posting a notice of the violation • Payment of attorney fees (if represented).

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average?

Answer No

2. During the last fiscal year, did any complaints alleging failure to provide reasonable accommodation result in a finding of discrimination or a settlement agreement?

Answer Yes

3. If the agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year, please describe the corrective measures taken by the agency.

In FY 2022, there were 9 cases where there was a finding of discrimination involving a PWD filing a harassment claim based on disability. In each case, the remedial and corrective actions ordered included: • Training for all individuals involved. • Consideration of disciplinary action for involved management officials. • Make-whole relief for the complainant (to include compensatory damages). • Restoration of leave. • Posting a notice of the violation; and • Payment of attorney fees (if represented).

Section VIII: Identification and Removal of Barriers

Element D of MD-715 requires agencies to conduct a barrier analysis when a trigger suggests that a policy, procedure, or practice may be impeding the employment opportunities of a protected EEO group.

1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?

Answer No

2. Has the agency established a plan to correct the barrier(s) involving PWD and/or PWTD?

Answer N/A

3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments

Source of the Trigger:	Other				
Specific Workforce Data Table:	Workforce Data Table - B4				
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	The less than expected participation rate of PWD in the GS-11 to SES (9.51%) Grade level cluster, as compared to the goal of 12%. The less than expected participation rate of PWTD in the GS-11 to SES (1.54%) Grade level cluster, as compared to the goal of 2%.				
STATEMENT OF BARRIER GROUPS:	<i>Barrier Group</i> People with Disabilities People with Targeted Disabilities				
Barrier Analysis Process Completed?:	N				
Barrier(s) Identified?:	N				
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	Barrier Name		Description of Policy, Procedure, or Practice		
	Less than expected participation rate of PWD and PWTD in the GS-11 to SES grade cluster		Further analysis is needed to determine the specific policy, procedure or practice causing the less than expected participation rates for PWD and PWTD.		
Objective(s) and Dates for EEO Plan					
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
10/01/2018	09/30/2021	No	09/30/2023		Complete a barrier analysis to identify the specific policy, procedure or practice that could be causing the trigger.
10/01/2018	01/31/2020	Yes	12/31/2021		Re-survey the workforce regarding their disability status.
Responsible Official(s)					
Title		Name		Standards Address The Plan?	
Executive Director, Human Resources Information Services		Joseph Thele		No	
Director of Outreach and Retention		Karen M. Basnight		No	
Director, Workforce Analysis		Ryan Pugh		Yes	

Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
10/01/2020	Develop an electronic self-reporting tool for employees to verify and change their race, ethnicity, gender and disability status that functions within HRSmart.	Yes	12/31/2021	12/23/2021
03/31/2021	Implement the self-reporting tool.	Yes	12/31/2021	12/23/2021
06/30/2021	Conduct a thorough investigation of relevant policies, procedures, and practices to determine the cause of the less than expected participation rates.	Yes	09/30/2023	
09/30/2021	Devise a plan to eliminate the identified barrier.	Yes	09/30/2023	
Report of Accomplishments				
Fiscal Year	Accomplishment			
2021	In January 2021, VA sent out a job aide on title 5 Non-competitive hiring authorities and other appointment flexibilities. This job aide provided information to HR specialists and hiring managers about various hiring flexibilities and served as a key tool in the recruitment strategy for efficiently hiring diverse and qualified candidates into Federal Government job opportunities. In January 2021, VA established an enterprise-wide Barrier Analysis Workgroup.			
2022	VA partnered with FFRDC to conduct a barrier analysis on the less than favorable representation of PWD and PWTD in higher graded positions.			

4. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

NA

5. For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s).

The ability for employees to self-report their disability status on a regular basis is critical to ensuring the accuracy of the data.

6. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.

Implementing the self-reporting tool was not enough to correct the trigger. VA plans to conduct a barrier analysis to identify the root cause(s) of the less than favorable representation of PWD and PWTD in higher graded positions.